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Attorneys for Defendant Zuffa, LLC, d/b/a
Ultimate Fighting Championship and UFC

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Cung Le, Nathan Quarry, Jon Fitch, on behalf
of themselves and all others similarly situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant.

Lead Case No.: 2:15-cv-01045-RFB-
(PAL)

Member Case Nos.:

2:15-cv-01046-RFB-(PAL)

2:15-cv-01055-RFB-(PAL)

2:15-cv-01056-RFB-(PAL)

2:15-cv-01057-RFB-(PAL)

**DECLARATION OF KIRK D.
HENDRICK IN SUPPORT OF ZUFFA,
LLC'S [PROPOSED] PROTECTIVE
ORDER**

Luis Javier Vazquez and Dennis Lloyd Hallman, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting Championship and UFC,

Defendant.

Case No. 2:15-cv-01055 RFB-(PAL)

Brandon Vera and Pablo Garza, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting Championship and UFC,

Defendant.

Case No. 2:15-cv-01056 RFB-(PAL)

Gabe Ruediger and Mac Danzig, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting Championship and UFC,

Defendant.

Case No. 2:15-cv-01057 RFB-(PAL)

Kyle Kingsbury and Darren Uyenoyama, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting Championship and UFC,

Defendant.

Case No. 2:15-cv-01046 RFB-(PAL)

1 I, KIRK D. HENDRICK, declare as follows:

2 1. I am over 21 years old and have personal knowledge of the information in this declaration.
3 I have been employed by Zuffa, LLC (“Zuffa”) since 2002 and I am currently Executive Vice
4 President and Chief Legal Officer for Zuffa. I have access to and have reviewed business records
5 relating to the information in this declaration. I have personal knowledge of the facts stated in
6 this declaration and if called to testify, I would and could competently testify to those facts.

7 2. I have reviewed Plaintiffs’ First Set of Requests for Production and First Set of
8 Interrogatories. Taken together, these discovery requests seek information covering essentially
9 every area of Zuffa’s business, including Zuffa’s most competitively sensitive financial and
10 business information. For example, Plaintiffs seek virtually all of the information in Zuffa’s
11 possession about its contracts and relationships with athletes, sponsors, venues, and television
12 distribution outlets, as well as a granular breakdown of every aspect of Zuffa’s revenues, costs
13 and other financial metrics. Disclosure of this information could provide our competitors or other
14 adverse parties with insights into our business strategies, revenue streams, costs and other
15 information and data, as well as the details of the economic terms of our dealings with fighters
16 and other third parties.

17 3. One particular concern that Zuffa has is that Robert Maysey, one of the counsel of record
18 for Plaintiffs in this matter, has for many years sought to promote an organization that he created
19 – the Mixed Martial Arts Fighters Association (“MMAFA”) – as a vehicle both for collective
20 bargaining for MMA athletes and as a group licensor for intellectual property and publicity rights
21 of MMA athletes. Mr. Maysey and the MMAFA have made statements positioning themselves as
22 directly adverse to Zuffa’s commercial interests as putative collective bargaining agents and as a
23 group licensor for fighters’ intellectual property rights that is directly competitive with Zuffa’s
24 efforts to license rights to sponsors, merchandisers and other third parties.

25 4. Zuffa’s commercially sensitive information maintains its value to Zuffa from the fact that
26 it is confidential and not known to Zuffa’s competitors, suppliers, customers, or other
27 commercially adverse parties. Disclosure would harm Zuffa’s competitive position and
28 significantly benefit those parties that compete or negotiate with Zuffa or are otherwise adverse to

1 Zuffa.

2 * * *

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4 I declare under penalty of perjury under the laws of the State of Nevada that the foregoing
5 is true and correct. Executed this 27th day of August 2015 in Las Vegas, Nevada.
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Kirk D. Hendrick
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